

THE SHISSIAS LAW FIRM, LLC
ADMINISTRATIVE AND ENVIRONMENTAL LAW

ALEXANDER GEORGE SHISSIAS

1727 HAMPTON STREET
COLUMBIA, SOUTH CAROLINA 29201

OFFICE: 803-540-3090
CELL: 803-240-2719
ALEX@SHISSIASLAWFIRM.COM
JOHN J. FANTRY, JR., OF COUNSEL
OFFICE: 803-712-0100
JFANTRY@SHISSIASLAWFIRM.COM

November 18, 2019

VIA SCPSC E-FILING DMS

Jocelyn G. Boyd, Esq.
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

Re: Annual Review of Base Rates for Fuel Costs for Dominion Energy South Carolina, Inc.
Docket No. 2020-2-E

Dear Ms. Boyd:

Please find attached for filing the *Petition to Intervene of CMC Steel South Carolina* in the above-referenced matter. By copy of this letter, I am serving all parties of record via Electronic Mail and First-Class Mail.

Please contact me if you have any questions concerning this filing.

Sincerely,



Alexander G. Shissias
S.C. Bar # 11610
The Shissias Law Firm, LLC
1727 Hampton Street
Columbia, SC 29201
alex@shissiaslawfirm.com

Local Counsel for CMC Steel South Carolina

**BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

IN RE: Annual Review of Base Rates for)	
Fuel Costs for Dominion Energy South)	Docket No. 2020-2-E
Carolina, Inc.)	

**PETITION TO INTERVENE OF
CMC STEEL SOUTH CAROLINA**

CMC Steel South Carolina (“CMC”) hereby petitions to intervene as a party of record in the above-captioned proceeding. CMC states the following grounds in support of its petition.

1) CMC owns and operates a steel manufacturing facility in Cayce, South Carolina. This facility utilizes an electric arc furnace (“EAF”) to melt and recycle steel. This process requires CMC to purchase very large quantities of electricity from Dominion Energy South Carolina, Inc. (“Dominion”) at a cost of millions of dollars per year. Because the cost of electricity is one of the major costs of steel-making utilizing an EAF, the cost of electricity directly affects CMC’s ability to produce steel at a competitive price. CMC is one of the largest retail customers of Dominion.

2) Due to the magnitude and unique characteristics of its load, CMC cannot be adequately represented by any other party to this proceeding. At this stage of the proceeding, CMC has not fully determined what positions it may take.

3) CMC’s mailing address is:

CMC Steel South Carolina
310 New State Road
Cayce, SC 29033

4) Mr. Shissias is authorized to accept service of papers in this proceeding on behalf of CMC. CMC also respectfully requests that Damon E. Xenopoulos be added jointly to the

service list as CMC may seek Mr. Xenopoulos's admission to appear before the Commission *pro hac vice* in this docket. Mr. Xenopoulos's address is:

Damon E. Xenopoulos
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson Street, N.W.
Suite 800 West
Washington, DC 20007
(202) 342-0800
Email: dex@smxblaw.com

WHEREFORE, for the reasons set forth above, CMC respectfully requests permission to intervene in this proceeding.

Respectfully submitted,



Alexander G. Shissias
S.C. Bar # 11610
The Shissias Law Firm, LLC
1727 Hampton Street
Columbia, SC 29201
(803) 540-3090
alex@shissiaslawfirm.com

Local Counsel for CMC Steel South Carolina

Dated: November 18, 2019

**BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

IN RE: Annual Review of Base Rates for)	
Fuel Costs for Dominion Energy South)	Docket No. 2020-2-E
Carolina, Inc.)	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via Electronic Mail and First-Class Mail:

Jeffery M. Nelson
Jenny R. Pittman
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
jnelson@regstaff.sc.gov
jpittman@regstaff.sc.gov

K. Chad Burgess
Matthew W. Gissendanner
Dominion Energy South Carolina, Inc.
220 Operation Way - MC C222
Cayce, SC 29033-3701
chad.burgess@scana.com
matthew.gissendanner@scana.com

Becky Dover
Carri Grube-Lybarker
South Carolina Department of
Consumer Affairs
P.O. Box 5757
Columbia, SC 29250
bdover@scconsumer.gov
clybarker@scconsumer.gov

Scott Elliott
Elliott & Elliot, P.A.
1508 Lady Street
Columbia, SC 29201
selliott@elliottlaw.us



Alexander G. Shissias
S.C. Bar #11610
The Shissias Law Firm, LLC
1727 Hampton Street
Columbia, SC 29201
(803) 540-3090
alex@shissiaslawfirm.com

Local Counsel for CMC Steel South Carolina

Dated: November 18, 2019